PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Interplastic Corporation / Molding Products Division
1545 S. Olive Street
South Bend, Indiana 46619

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T141-6465-00091	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 17, 2002 Expiration Date: July 17, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary sheet molding compound manufacturing facility.

Responsible Official:	Robert C. Hoffman, Corporate Environmental Officer
Source Address:	1545 S. Olive Street, South Bend, IN 46619
Mailing Address:	1545 S. Olive Street, South Bend, IN 46619
SIC Code:	3087, 3089
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Eleven (11) mixers, consisting of:
- (1) one (1) small cowles mixer, identified as Mixer 1, constructed in July 1978, with a maximum capacity of 9,000 pounds per hour, exhausting to vents V1 through V6;
- (2) one (1) large cowles mixer, identified as Mixer 2, constructed in April 1997, with a maximum capacity of 9,000 pounds per hour, exhausting to vents V1 through V6;
- (3) one (1) large littleford, identified as Mixer 3, constructed in March 1998, with a maximum capacity of 9,000 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vent V9;
- (4) one (1) small littleford, identified as Mixer 4, constructed in March 1998, with a maximum capacity of 2,700 pounds per hour, utilizing one (1) dust collector for particulate matter control;
- (5) one (1) tabletop cowles mixer, identified as Mixer 5 (used to make sample parts only), constructed in July 1978, with a maximum capacity of 150 pounds per hour, and exhausting to vents V9a and V9b;
- (6) one (1) holding tank, identified as Mixer 6, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
- (7) one (1) holding tank, identified as Mixer 7, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
- (8) one (1) holding tank, identified as Mixer 8, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
- (9) one (1) premix tank, identified as Mixer 9, constructed in March 1998, with a maximum capacity of 5,000 pounds per hour, and exhausting to vents V9a and V9b;
- (10) one (1) pump tank, identified as Mixer 10, constructed in March 1998, with a maximum capacity of 8,400 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;
- (11) one (1) pump tank, identified as Mixer 11, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;

(b) Four (4) molding presses, consisting of:
  (1) one (1) compression press, identified as Press 1, constructed in June 1980, with a maximum capacity of 100 pounds per hour;
  (2) one (1) compression press, identified as Press 2, constructed in July 1978, with a maximum capacity of 100 pounds per hour;
  (3) one (1) press, identified as Press 3 (used for quality control or R&D purposes only), constructed in July 1978, with a maximum capacity of 50 pounds per hour;
  (4) one (1) compression press, identified as Press 4 (used for quality control or R&D purposes only), constructed in July 1978, with a maximum capacity of 10 pounds per hour;

(c) One (1) extruder, constructed in February 1983, with a maximum capacity of 5000 pounds per hour, exhausting to vent V8;

(d) One (1) sheet molding compound manufacturing operation, identified as SMC-1, constructed in July 1978, with a maximum process weight rate of 12,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d;

(e) One (1) sheet molding compound manufacturing operation, identified as SM-9603-48, constructed in April 1998, with a maximum process weight rate of 12,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d; and

(f) One (1) maturation room, constructed in 1996, with a maximum process weight rate of 12,000 pounds per hour from SMC-1 and a maximum process weight rate of 12,000 pounds per hour from SMC-2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone Number: (219) 235-9775
Facsimile Number: (219) 235-7558

Telephone Number: (219) 245-4871
Facsimile Number: (219) 245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a (temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Eleven (11) mixers, consisting of:
(1) one (1) small cowles mixer, identified as Mixer 1, constructed in July 1978, with a maximum capacity of 9,000 pounds per hour, exhausting to vents V1 through V6;
(2) one (1) large cowles mixer, identified as Mixer 2, constructed in April 1997, with a maximum capacity of 9,000 pounds per hour, exhausting to vents V1 through V6;
(3) one (1) large littleford, identified as Mixer 3, constructed in March 1998, with a maximum capacity of 9,000 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vent V9;
(4) one (1) small littleford, identified as Mixer 4, constructed in March 1998, with a maximum capacity of 2,700 pounds per hour, utilizing one (1) dust collector for particulate matter control;
(5) one (1) tabletop cowles mixer, identified as Mixer 5 (used to make sample parts only), constructed in July 1978, with a maximum capacity of 150 pounds per hour, and exhausting to vents V9a and V9b;
(6) one (1) holding tank, identified as Mixer 6, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
(7) one (1) holding tank, identified as Mixer 7, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
(8) one (1) holding tank, identified as Mixer 8, constructed in March 1998, with a maximum capacity of 2,800 pounds per hour;
(9) one (1) premix tank, identified as Mixer 9, constructed in March 1998, with a maximum capacity of 5,000 pounds per hour, and exhausting to vents V9a and V9b;
(10) one (1) pump tank, identified as Mixer 10, constructed in March 1998, with a maximum capacity of 8,400 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d; and
(11) one (1) pump tank, identified as Mixer 11, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations) particulate emissions from the facilities shall be limited as outlined in the table below, by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)
Mixer 1	2.07	6.68
Mixer 2	2.07	6.68
Mixer 3	2.07	6.68
Mixer 4	0.621	2.98
Mixer 5	0.0345	0.43

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The usage of VOC for Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11 shall each be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which would increase the potential to emit VOC from Mixer 2 to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) The usage of single HAP delivered to each of the mixers (identified as Mixer 3 and Mixer 10) shall be limited to less than 10 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from each of the mixers (identified as Mixer 3 and Mixer 10) that would increase single HAP emissions to more than 10 tons per year, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1 before such change can occur.

(b) Any change or modification which would increase the potential to emit single HAP from each of the mixers (identified as Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9 or Mixer 11) to ten (10) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 2-4.1-1.

(c) The total usage of combined HAP delivered to the mixers (identified as Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11) shall be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from the mixers (Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11) that would increase combined HAP emissions to more than 25 tons per year, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1 before such change can occur.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with D.1.1, the dust collectors for PM control shall be in operation and control emissions from Mixer 3 and Mixer 4 at all times when Mixer 3 and Mixer 4 are in operation.

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform VOC testing on one (1) of the eight (8) mixers (Mixer 1, 2, 3, 4, 5, 9, 10 or 11), and on one (1) of the three (3) holding tank mixers (Mixer 6, 7 or 8), by a method approved by the Commissioner, to determine that the alternate emission factors submitted by the source are valid. This test shall be performed once initially to prove the alternative emission factor. This test shall not be repeated unless there is a change in the process. If the results of the stack test do not adhere to the alternative emission factors submitted by the source, the source shall require OAQ's approval before the new emission factors determined by the stack test can be used.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2.

(1) The amount and emission factor of each product manufactured. Records shall include purchase orders and invoices necessary to verify the type and amount used.

(2) A log of the dates of use.

(3) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records

(1) The amount and emission factor of each product manufactured. Records shall include purchase orders and invoices necessary to verify the type and amount used.

(2) A log of the date of use.

(3) The weight of HAPs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(a), D.1.3(a) and D.1.3(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) Four (4) molding presses, consisting of:
- (1) one (1) compression press, identified as Press 1, constructed in June 1980, with a maximum capacity of 100 pounds per hour;
- (2) one (1) compression press, identified as Press 2, constructed in July 1978, with a maximum capacity of 100 pounds per hour;
- (3) one (1) press, identified as Press 3 (used for quality control or R&D purposes only), constructed in July 1978, with a maximum capacity of 50 pounds per hour;
- (4) one (1) compression press, identified as Press 4 (used for quality control or R&D purposes only), constructed in July 1978, with a maximum capacity of 10 pounds per hour;

(c) One (1) extruder, constructed in February 1983, with a maximum capacity of 5000 pounds per hour, exhausting to vent V8;

(d) One (1) sheet molding compound manufacturing operation, identified as SMC-1, constructed in July 1978, with a maximum process weight rate of 12,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d;

(e) One (1) sheet molding compound manufacturing operation, identified as SM-9603-48, constructed in April 1998, with a maximum process weight rate of 12,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d; and

(f) One (1) maturation room, constructed in 1996, with a maximum process weight rate of 12,000 pounds per hour from SMC-1 and a maximum process weight rate of 12,000 pounds per hour from SMC-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from each of Press 1, the extruder, SMC-2, or from the maturation room to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform VOC testing on the one (1) extruder, one (1) of the two (2) sheet molding compound operations and the one (1) maturation room, by a method approved by the Commissioner, to determine that the alternate emission factors submitted by the source are valid. This test shall be performed once initially to prove the alternative emission factor. This test shall not be repeated unless there is a change in the process. If the results of the stack test do not adhere to the alternative emission factors submitted by the source, the source shall require OAQ's approval before the new emission factors determined by the stack test can be used.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1.

(1) The amount and emission factor of each product manufactured. Records shall include purchase orders and invoices necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091
Facility: Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11
Parameter: VOC
Limit: VOC emissions from each mixer not to exceed 25 tons per twelve (12) consecutive month period rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Mixer 3			
Mixer 4			
Mixer 6			
Mixer 7			
Mixer 8			
Mixer 9			
Mixer 10			
Mixer 11			
Month 2			
Mixer 3			
Mixer 4			
Mixer 6			
Mixer 7			
Mixer 8			
Mixer 9			
Mixer 10			
Mixer 11			
Month 3			
Mixer 3			
Mixer 4			
Mixer 6			
Mixer 7			
Mixer 8			
Mixer 9			
Mixer 10			
Mixer 11			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091
Facility: Mixer 3
Parameter: Single HAP
Limit: Single HAP emissions not to exceed 10 tons per twelve (12) consecutive month period rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	HAP Usage This Month	HAP Usage Previous 11 Months	HAP Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091
Facility: Mixer 10
Parameter: Single HAP
Limit: Single HAP emissions not to exceed 10 tons per twelve (12) consecutive month period rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	HAP Usage This Month	HAP Usage Previous 11 Months	HAP Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091
Facility: Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11
Parameter: Total HAPs
Limit: Total HAP emissions not to exceed 25 tons per twelve (12) consecutive month period rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total HAP Usage This Month	Total HAP Usage Previous 11 Months	Total HAP Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Interplastic Corporation / Molding Products Division
Source Location: 1545 S. Olive Street, South Bend, Indiana 46619
SIC Code: 3087, 3089
County: St. Joseph
Operation Permit No.: T141-6465-00091
Permit Reviewer: NH/EVP

On December 16, 2000, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Interplastic Corporation / Molding Products Division had applied for a Part 70 (Title V) Operating Permit relating to the operation of a sheet molding compound manufacturing facility. The notice also stated that OAQ proposed to issue a Title V for this operation and provided information on how the public could review the proposed Title V and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Title V should be issued as proposed.

On January 15, 2001, Daniel J. O'Neal, Director of Engineering at Interplastic Corporation / Molding Products Division, submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Equipment throughputs [ref. A.2, and D.1]

a) Throughputs previously provided were based on a daily average capacity, divided by 24 hours to get hourly capacity. Since compliance for certain emissions will be based on a maximum hourly rate, the equipment hourly rates need to be adjusted to their maximum short term, hourly capacity. Equipment and maximum hourly rate are summarized below:

<----------	<----Material Flow			
Production Line	Fed from either:			
SMC-1 12,000 lb/hr SMC material (resin, powder, glass)	Mixer 1 9,000 lb/hr resin, powders, see (1)			
	Mixer 2 9,000 lb/hr resin, powders			
<----------	<----------	<----------	<----------	<----Material Flow
Production Line	Fed from:			
SMC-2 12,000 lb/hr SMC material (resin, powders, glass)	Mixer 10 8,400 lb/hr SMC paste	Mixers 6, 7, & 8 8,400 lb/hr total; 2,800 lb/hr each SMC paste See (2)	Mixer 3 9,000 lb/hr resin, powder mixing	Mixer 9 5,000 lb/hr resin, liquid additives
	Mixer 11 3,750 lb/hr SMC paste		Mixer 4 2,700 lb/hr resin, powder mixing	
<----------	<----Material Flow			
SMC-1 or -2	Mixer 5 150 lb/hr SMC paste: Samples only			

Notes:
(1) Mixers 1 or 2 is used to feed SMC-1. Occasionally, mixer 1 or 2 will make a small batch for SMC-2.
(2) Mixers 6, 7, and 8 are holding tanks; these are used one at a time to feed SMC-2. Average process weight rate for each would be 2,800 lb/hr; maximum for one at a time is 8,400 lb/hr.
(3) SMC paste is mixed resin and powders.
(4) Powders added only to Mixers 1, 2, 3, 4, and 5.
(5) Mixer 5 used to make sample parts only.

b) The following is a brief description of each "Mixer." Mixers 1, 2, 3, 4, and 5 are high speed mixers that mix liquid resin and powders to make what's called SMC paste. Mixers 1 and 2 make SMC paste for the SMC-1 machine. Mixers 3 and 4 are only used in conjunction with SMC-2. Mixer 5 is only used to make small 5 gallon batches of SMC paste for samples. Mixers 6, 7, and 8 are holding tanks with slow mixers used to store and just keep the SMC paste uniform in composition. SMC paste from Mixer 3 is stored in one of these tanks before being transferred to Mixers 10 or 11. Mixer 9 blends resins together before the SMC paste is made in Mixers 3 or 4. Mixers 10 and 11 are holding tanks to feed the SMC-2 machine. The mixers are not used all at the same time; the production is broken into separate processing/mixing steps.

c) As indicated in Note (4), powders are added only to mixers 1, 2, 3, 4, and 5. Mixers 3, and 4 are currently tied into a dust collection system, and later this year, mixers 1 and 2 will also be vented to the dust collector.

d) For the four (4) molding presses, it is a point of clarification that Presses #3 and #4 are used only for Quality Control lab purposes, or for R&D. Production parts are only made on Presses 1 and 2.

Response 1

The change in the process weight rate for the following equipment will increase the potential to emit of the source. The potential to emit table as well as the potential to emit after issuance table have been updated (see response to Comment 2). All these emission units were constructed and operated prior to the receipt of proper permit as stated in the TSD. The proposed Title V permit is intended to satisfy the NSR requirements.

The following changes have been made to Section A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Eleven (11) mixers, consisting of:

(1) one (1) small cowles mixer, identified as Mixer 1, constructed in July 1978, with a maximum capacity of ~~6,770~~ **9,000** pounds per hour, exhausting to vents V1 through V6;

(2) one (1) large cowles mixer, identified as Mixer 2, constructed in April 1997, with a maximum capacity of ~~5,333~~ **9,000** pounds per hour, exhausting to vents V1 through V6;

(3) one (1) large littleford, identified as Mixer 3, constructed in March 1998, with a maximum capacity of ~~4,400~~ **9,000** pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vent V9;

(4) one (1) small littleford, identified as Mixer 4, constructed in March 1998, with a maximum capacity of ~~2,000~~ **2,700** pounds per hour~~;~~**, utilizing one (1) dust collector for particulate matter control;**

(5) one (1) tabletop cowles mixer, identified as Mixer 5 **(used to make sample parts only)**, constructed in July 1978, with a maximum capacity of ~~500~~ **150** pounds per hour, ~~utilizing one (1) dust collector for particulate matter control,~~ and exhausting to vents V9a and V9b;

(6) one (1) holding tank, identified as Mixer 6, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;

(7) one (1) holding tank, identified as Mixer 7, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;

(8) one (1) holding tank, identified as Mixer 8, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;

(9) one (1) premix tank, identified as Mixer 9, constructed in March 1998, with a maximum capacity of ~~3,750~~ **5,000** pounds per hour, and exhausting to vents V9a and V9b;

(10) one (1) pump tank, identified as Mixer 10, constructed in March 1998, with a maximum capacity of ~~3,750~~ **8,400** pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;

(11) one (1) pump tank, identified as Mixer 11, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;

(b) Four (4) molding presses, consisting of:

(1) one (1) compression press, identified as Press 1, constructed in June 1980, with a maximum capacity of 100 pounds per hour;

(2) one (1) compression press, identified as Press 2, constructed in July 1978, with a maximum capacity of 100 pounds per hour;

(3) one (1) press, identified as Press 3 **(used for quality control or R&D purposes only)**, constructed in July 1978, with a maximum capacity of 50 pounds per hour;

(4) one (1) compression press, identified as Press 4 **(used for quality control or R&D purposes only)**, constructed in July 1978, with a maximum capacity of 10 pounds per hour;

(c) One (1) extruder, constructed in February 1983, with a maximum capacity of 5000 pounds per hour, exhausting to vent V8;

(d) One (1) sheet molding compound manufacturing operation, identified as SMC-1, constructed in July 1978, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour, exhausting to vents V9a, V9b, V9c and V9d;

(e) One (1) sheet molding compound manufacturing operation, identified as SM-9603-48, constructed in April 1998, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour, exhausting to vents V9a, V9b, V9c and V9d; and

(f) One (1) maturation room, constructed in 1996, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour from SMC-1 and a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour from SMC-2.

The following changes have been made to the facility description box in Section D.1.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Eleven (11) mixers, consisting of:
(1) one (1) small cowles mixer, identified as Mixer 1, constructed in July 1978, with a maximum capacity of ~~6,770~~ **9,000** pounds per hour, exhausting to vents V1 through V6;
(2) one (1) large cowles mixer, identified as Mixer 2, constructed in April 1997, with a maximum capacity of ~~5,333~~ **9,000** pounds per hour, exhausting to vents V1 through V6;
(3) one (1) large littleford, identified as Mixer 3, constructed in March 1998, with a maximum capacity of ~~4,400~~ **9,000** pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vent V9;
(4) one (1) small littleford, identified as Mixer 4, constructed in March 1998, with a maximum capacity of ~~2,000~~ **2,700** pounds per hour~~,~~**, utilizing one (1) dust collector for particulate matter control;**
(5) one (1) tabletop cowles mixer, identified as Mixer 5 **(used to make sample parts only)**, constructed in July 1978, with a maximum capacity of ~~500~~ **150** pounds per hour, ~~utilizing one (1) dust collector for particulate matter control,~~ and exhausting to vents V9a and V9b;
(6) one (1) holding tank, identified as Mixer 6, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;
(7) one (1) holding tank, identified as Mixer 7, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;
(8) one (1) holding tank, identified as Mixer 8, constructed in March 1998, with a maximum capacity of ~~1,250~~ **2,800** pounds per hour~~, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b~~;
(9) one (1) premix tank, identified as Mixer 9, constructed in March 1998, with a maximum capacity of ~~3,750~~ **5,000** pounds per hour, and exhausting to vents V9a and V9b;
(10) one (1) pump tank, identified as Mixer 10, constructed in March 1998, with a maximum capacity of ~~3,750~~ **8,400** pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d; **and**
(11) one (1) pump tank, identified as Mixer 11, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

The following changes have been made to the facility description box in Section D.2.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(b) Four (4) molding presses, consisting of:
(1) one (1) compression press, identified as Press 1, constructed in June 1980, with a maximum capacity of 100 pounds per hour;
(2) one (1) compression press, identified as Press 2, constructed in July 1978, with a maximum capacity of 100 pounds per hour;
(3) one (1) press, identified as Press 3 **(used for quality control or R&D purposes only)**, constructed in July 1978, with a maximum capacity of 50 pounds per hour;
(4) one (1) compression press, identified as Press 4 **(used for quality control or R&D purposes only)**, constructed in July 1978, with a maximum capacity of 10 pounds per hour;
(c) One (1) extruder, constructed in February 1983, with a maximum capacity of 5000 pounds per hour, exhausting to vent V8;
(d) One (1) sheet molding compound manufacturing operation, identified as SMC-1, constructed in July 1978, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour, exhausting to vents V9a, V9b, V9c and V9d;
(e) One (1) sheet molding compound manufacturing operation, identified as SM-9603-48, constructed in April 1998, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour, exhausting to vents V9a, V9b, V9c and V9d; and
(f) One (1) maturation room, constructed in 1996, with a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour from SMC-1 and a maximum process weight rate of ~~8,000~~ **12,000** pounds per hour from SMC-2.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 2

Table for Allowable PM Emissions [ref D.1.1]
a) Process weight rates will change based on the above information.
b) As indicated above, powders are added to mixers 1 to 5. Add mixer 4, delete mixers 6, 7, and 8.

Response 2

The allowable PM emissions table has been revised due to changes in process weight rates of the mixers supplied by the source. The following changes have been made to Section D.1.1.

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations) particulate emissions from the facilities shall be limited as outlined in the table below, by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)
Mixer 1	~~1.5571~~ **2.07**	~~5.52~~ **6.68**
Mixer 2	~~1.22659~~ **2.07**	~~4.70~~ **6.68**
Mixer 3	~~1.012~~ **2.07**	~~4.13~~ **6.68**
Mixer 4	**0.621**	**2.98**
Mixer 5	~~0.115~~ **0.0345**	~~0.96~~ **0.43**
~~Mixer 6~~	~~0.2875~~	~~1.78~~
~~Mixer 7~~	~~0.2875~~	~~1.78~~
~~Mixer 8~~	~~0.2875~~	~~1.78~~

(Note: Mixers 6 through 8 (holding tanks) are not subject to the requirements of 326 IAC 6-3-2, because they do not emit any PM).

Since Mixer 3 and Mixer 4 utilize dust collectors for particulate matter control to comply with 326 IAC 6-3, a new Condition D.1.5 (Particulate Matter) will be added to the Compliance Determination Section. The rest of Section D.1 will be re-numbered accordingly.

D.1.5 Particulate Matter (PM)

In order to comply with D.1.1, the dust collectors for PM control shall be in operation and control emissions from Mixer 3 and Mixer 4 at all times when Mixer 3 and Mixer 4 are in operation.

The "Potential to Emit" and "Potential to Emit After Issuance" sections in the TSD have also been changed accordingly as follows:

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	~~41.86~~ **60.19**
PM-10	~~42.00~~ **60.33**
SO_2	0.01
VOC	~~74.58~~ **103.16**
CO	2.06
NO_x	2.45

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	~~74.45~~ **103.03**
TOTAL	~~74.45~~ **103.03**

(Note: Changes were made to the Potential to Emit After Issuance table because the process weight rates have changed (please refer to comment/response 1 for the new process weight rates)).

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Mixer 1, Mixer 2 and Mixer 5	~~24.38~~ **36.56**	~~24.38~~ **36.56**	0.00	~~21.53~~ **31.00**	0.00	0.00	~~21.53~~ **31.00**	~~21.53~~ **31.00**
Mixer 3 *	**0.02**	**0.02**	**0.00**	**7.33**	**0.00**	**0.00**	**9.90**	**9.90**
Mixer 10 *	**0.00**	**0.00**	**0.00**	**6.84**	**0.00**	**0.00**	**9.90**	**9.90**
~~Mixer 3,~~ Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, ~~Mixer 10~~ and Mixer 11 *	0.01	0.01	0.00	~~24.00~~ **9.84**	0.00	0.00	~~36.56~~ **20.64**	~~36.56~~ **20.64**
Molding Presses	0.00	0.00	0.00	2.51	0.00	0.00	2.51	2.51
Extruder Operation	0.00	0.00	0.00	3.29	0.00	0.00	3.29	3.29
Sheet Molding Compound Operation	0.00	0.00	0.00	~~10.51~~ **15.77**	0.00	0.00	~~10.51~~ **15.77**	~~10.51~~ **15.77**

Maturation Room	0.00	0.00	0.00	~~0.06~~ **0.09**	0.00	0.00	~~0.06~~ **0.09**	~~0.06~~ **0.09**
Insignificant Activities	0.05	0.19	0.01	0.13	2.06	2.45	0.00	0.00
Total Emissions	~~24.45~~ **36.64**	~~24.59~~ **36.78**	0.01	~~62.03~~ **76.80**	2.06	2.45	~~74.45~~ **93.11**	~~74.45~~ **93.11**

***** Mixers 3, 4, 6, 7, 8, 9, 10 and 11 are taking a material usage limitation to avoid 326 IAC 8-1-6 (BACT). ~~The mixers~~ **Mixer 4, 6, 7, 8, 9 and 11** are not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because they are independent of one another and each mixer has potential single HAP emissions of less than ten (10) tons per year. **Mixer 3 and Mixer 10 are not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because they will limit single HAP usage to less than 10 tons per year.**

Comment 3

VOC emissions limits [ref D.1.2(a)]
It is assumed that the limit of 25 tons per 12 month period for the reference mixers (3, 4, and 6-11) will be based on actual operating data.

Response 3

Compliance with the VOC limit of 25 tons per 12 month period for mixers 3, 4, and 6-11 is based on actual operating data. A quarterly report is provided at the end of the permit to report actual VOC emissions from mixers 3, 4, and 6-11. No changes have been made to the permit as a result of this comment.

Comment 4

VOC emissions limits [ref D.1.2(b)]
For mixer 2, the 25 tons per year is based on a maximum potential to emit.

Response 4

The VOC limit of 25 tons per year for mixer 2 is based on the potential to emit. Any change or modification that would increase the potential to emit VOC from Mixer 2 to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6. No changes have been made to the permit as a result of this comment.

Comment 5

HAP PTE emissions for newer mixers [ref D.1.3]
Mixers 3, 4 and 6-11 are all associated with the SMC-2 process equipment. This equipment is a combination of resin/powder mixers and holding tanks for the SMC machine. The above table outlines the typical material flow for this equipment.

Response 5

New language has been added to Condition D.1.3 to reflect changes due to the newly provided process weight rates. The potential to emit table has been updated due to these changes. The potential to emit of single HAP and total HAPs are greater than 10 and 25 tons per year, respectively, therefore, new conditions are required to limit single HAP and total HAPs emissions to render the requirements of 326 IAC 2-4.1-1 not applicable. The following changes have been made to Condition D.1.3.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

(a) **The usage of single HAP delivered to each of the mixers (identified as Mixer 3 and Mixer 10) shall be limited to less than 10 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from each of the mixers (identified as Mixer 3 and Mixer 10) that would increase single HAP emissions to more than 10 tons per year, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1 before such change can occur.**

(b) Any change or modification which would increase the potential to emit single HAP from ~~Mixer 3,~~ **each of the mixers (identified as** Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9~~, Mixer 10~~ or Mixer 11**)** to ten (10) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 2-4.1-1.

(c) **The total usage of combined HAP delivered to the mixers (identified as Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11) shall be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the maximum achievable control technology (MACT) requirement in 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification, from the mixers (Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11) that would increase combined HAP emissions to more than 25 tons per year, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1 before such change can occur.**

Also, three new quarterly reporting forms (single HAP for Mixer 3 and Mixer 10 and total HAP for Mixers 3, 4, 6, 7, 8, 9, 10 and 11) have been added to the permit. These forms should be submitted to IDEM every quarter to demonstrate compliance with Conditions D.1.3(a) and D.1.3(c). Condition D.1.7 (now re-numbered D.1.8) has been revised to include this.

D.1.~~7~~**8** Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s** D.1.2(a)**, D.1.3(a) and D.1.3(c)** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Comment 6

Testing Requirements [ref D.1.5(a) and (b)]

a) PM testing will be performed on one mixer from #1 to #5, since these are the only mixers to which powders are added; omit Mixers 6, 7, and 8 here.

b) Based on the test plan and results of the testing, the emission factors that we will use to estimate emissions may be adjusted to more accurately reflect actual emissions.

c) The same comment above in b applies to section D.2.3.

Response 6

PM and PM10 testing is not required for the mixers because they are in compliance with 326 IAC 6-3-2. Condition D.1.5(a) (now re-numbered D.1.6(a)) is being revised.

Based on the test plan and results of the testing, if the emission factors that will be used to estimate emissions are different from the alternative emission factors submitted in this Title V application, IDEM, OAQ should be notified before the new emission factors determined by the stack test can be used. The following changes have been made to Condition D.1.5 (now re-numbered D.1.6) and Condition D.2.3.

D.1.5~~6~~ Testing Requirements [326 IAC 2-7-6(1),(6)]

~~(a) Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform PM and PM10 testing on one (1) of the seven (7) mixers (identified as Mixer 1, Mixer 2, Mixer 3, Mixer 5, Mixer 6, Mixer 7 and Mixer 8), by a method approved by the Commissioner, to determine that the alternative emission factors submitted by the source are valid and for compliance with Condition D.1.1. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

~~(b)~~ Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform VOC testing on one (1) of the ~~eleven (11)~~ **eight (8)** mixers **(Mixer 1, 2, 3, 4, 5, 9, 10 or 11), and on one (1) of the three (3) holding tank mixers (Mixer 6, 7 or 8)**, by a method approved by the Commissioner, to determine that the alternate emission factors submitted by the source are valid. This test shall be **performed once initially to prove the alternative emission factor. This test shall not be repeated unless there is a change in the process.** ~~repeated at least once every five years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~ **If the results of the stack test do not adhere to the alternative emission factors submitted by the source, the source shall require OAQ's approval before the new emission factors determined by the stack test can be used.**

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform VOC testing on one (1) of the four (4) molding presses, the one (1) extruder, one (1) of the two (2) sheet molding compound operations and the one (1) maturation room, by a method approved by the Commissioner, to determine that the alternate emission factors submitted by the source are valid. This test shall be **performed once initially to prove the alternative emission factor. This test shall not be repeated unless there is a change in the process.** ~~repeated at least once every five years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~ **If the results of the stack test do not adhere to the alternative emission factors submitted by the source, the source shall require OAQ's approval before the new emission factors determined by the stack test can be used.**

Comment 7

Record Keeping [ref D.1.6(a) and (b)]

a) Requirement is to keep track of amount of each product manufactured. Since all SMC material produced is very similar, we will keep track of total pounds manufactured through the various pieces of equipment and SMC 1 and 2. Average emissions factors will be used for calculating emissions. Since emission factors are not specific to each SMC product, total pounds throughput will be tracked and used for emissions estimates. The emissions estimates will be calculated in a similar manner as outlined in the associated Technical Support Document.

b) The same comments applies to section D.2.4(a).

Response 7

While emission factors are not specific to the SMC product, they are specific to the processes. Thus, average emission factors cannot be used for calculating emissions. No changes have been made to Condition D.1.6 (now re-numbered D.1.7) or Condition D.2.4 of this permit as a result of this comment.

Comment 8

Facility Description for presses, etc. [ref Section D.2 table]

a) In a similar manner, the throughputs listed for the SMC-1 and -2 were based on a daily average throughput divided by 24 hours to get an hourly capacity. During a given hour of operation, maximum throughput for either equipment could conceivably reach 12,000 lb/hr. Therefore, SMC-1 and SMC-2 maximum capacities should be changed to 12,000 lb/hr. The Maturation room throughput should be based on a maximum average hourly rate of 16,000 lb/hr.

b) The molding presses -3 and -4 are used for quality control or R&D purposes only, and not for production purposes. Therefore actual throughputs would be very low.

Response 8

The potential to emit table and the potential to emit after issuance table have been updated.

The emissions from the SMC-1 and SMC-2 were re-calculated and the revised calculation sheet (Page 6 of 8 of TSD Addendum App A) is attached.

The emissions from the maturation room were re-calculated and the revised calculation sheet (Page 7 of 8 of TSD Addendum App A) is attached.

The calculation sheet for the molding presses (Page 4 of 8 of TSD Addendum App A) has been updated to indicated that molding press 3 and molding press 4 are used for quality control or R&D purposes only.

The increases in the VOC emissions from the SMC-1, SMC-2, maturation room, molding press 3 and molding press 4 due to the above changes do not trigger any new requirements because the potential to emit of VOC from each unit after the capacity change is still less than the 326 IAC 8-1-6 applicability threshold of 25 tons per year.

Comment 9

Technical Support Document, Unpermitted Emission Units

a) The same throughput changes as described in the above #1 and #8 apply to the equipment descriptions.
b) The same comments on powder addition to only Mixers 1-5, as described above in #1(c), also apply to the table on page 7 of 9 in the TSD.

Response 9

The throughput changes were already made in the response to Comment 1 and the table on page 7 of 9 in the TSD has been revised as shown in the response to Comment 2.

Comment 10

TSD, Appendix A

a) Process weight rates will change on all tables accordingly as indicated above.
b) Emission Factor for Mixers 6, 7, and 8 is recommended to be changed to 0.059 lb emission/ton processed. This is based on the corresponding emission factor from the reference source (CFA document) and the actual operation of this equipment. These tanks are storage tanks, no mixing; although they do have a slow turning agitator used to keep material uniform.

Response 10

The PM/PM10 emissions from the mixers were re-calculated and the revised calculation sheet (Page 2 of 8 of TSD Addendum App A) is attached.

The VOC and HAP emissions from the mixers were re-calculated and the revised calculation sheet (Page 3 of 8 of TSD Addendum App A) is attached. The emission factors for the holding tanks has been changed.

The VOC and HAP emissions from the molding presses were re-calculated and the revised calculation sheet (Page 4 of 8 of TSD Addendum App A) is attached.

The VOC and HAP emissions from the SMC machines were re-calculated and the revised calculation sheet (Page 6 of 8 of TSD Addendum App A) is attached.

The VOC and HAP emissions from the maturation room were re-calculated and the revised calculation sheet (Page 7 of 8 of TSD Addendum App A) is attached.

A revised summary calculation sheet (Page 1 of 8 of TSD Addendum App A) is attached.

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. The Part 70 permit has been revised to reflect the name change of the Office of Air Management (OAM) to the Office of Air Quality (OAQ).

2. Condition D.1.2 has been clarified based on the fact that each of the mixers can produce product independently and can be considered an individual facility as follows. The reporting form has also been revised.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) The usage of VOC ~~delivered to~~ **for** Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11 shall **each** be limited to less than 25 tons per 12 consecutive month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which would increase the potential to emit VOC from Mixer 2 to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

3. Condition D.2.1 has been clarified as follows:

D.2.1 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC from **each of** Press 1, the extruder, SMC-2, or from the maturation room to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-1-6.

4. Since AP-42 emission factors have been used to determine emissions from the molding presses (refer to revised calculations, Page 4 of 8 TSD Addendum App A) testing will not be required for the molding presses. The VOC and HAP emissions from the extruder were re-calculated based on the emission factors provided by the Permittee, and the revised calculation sheet (Page 5 of 8 of TSD Addendum App A) is attached. These emission factors have never been tested and shall be tested for their accuracy.

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days of reaching maximum capacity but no less than 180 days from permit issuance, the Permittee shall perform VOC testing on ~~one (1) of the four (4) molding presses,~~ the one (1) extruder, one (1) of the two (2) sheet molding compound operations and the one (1) maturation room, by a method approved by the Commissioner, to determine that the alternate emission factors submitted by the source are valid. This test shall be performed once initially to prove the alternative emission factor. This test shall not be repeated unless there is a change in the process. If the results of the stack test do not adhere to the alternative emission factors submitted by the source, the source shall require OAQ's approval before the new emission factors determined by the stack test can be used.

5. Condition B.2 Permit Term is revised to add the new rule cite.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

6. B.8 Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit~~, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(~~b~~**c**) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~**Section** B, Emergency Provisions.

7. The following changes have been made to Condition B.10.

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance ~~Data Section~~ **Branch**, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the St. Joseph County Health Department on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and the St. Joseph County Health Department may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

8. In Condition B.12 Emergency Provisions, paragraphs (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16~~.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the St. Joseph County Health Department/Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: (219) 235-9775
Facsimile Number: (219) 235-7558

Telephone Number: (219) 245-4871
Facsimile Number: (219) 245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, and the St. Joseph County Health Department may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, and the St. Joseph County Health Department by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

9. Paragraph (b) has been removed from Condition B.13 Permit Shield. Since Condition B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed **in** compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.~~

(~~c~~**b**) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and the St. Joseph County Health Department shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(~~d~~**c**) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(~~e~~**d**) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(~~f~~**e**) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(~~g~~**f**) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or the St. Joseph County Health Department has issued the modifications. [326 IAC 2-7-12(c)(7)]

(~~h~~**g**) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or the St. Joseph County Health Department has issued the modification. [326 IAC 2-7-12(b)(7)]

10. Condition B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed. A new Condition B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 ~~Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~**Prior Permits Superseded [326 IAC 2-1.1-9.5]**

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

11. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are~~ **A deviation** required to be reported ~~by~~ **pursuant to** an applicable requirement **that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and do**es** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~.

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

12. Condition B.18 (Permit Amendment or Modification) has been changed to replace "should" with "shall" in subpart (b). The Office of Legal Counsel has advised that the use of the word "shall" is more enforceable and will prevent sources from indicating they are not required to certify.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

Any such application ~~should~~ **shall** be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

13. Condition B.20 (Operational Flexibility) has been changed to clarify the reason a certification is not required.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and St. Joseph County Health Department in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted **is not considered an application form, report or compliance certification. Therefore, the notification** by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

14. Condition B.24 (Annual Fee Payment) has been changed to add "to" in subpart (a) as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant **to** 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

15. C.6 (Operation of Equipment) has been revised to clarify the requirements of the condition.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute~~,~~ **or** rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment equipment is in operation.

16. Condition C.7 (Asbestos Abatement Projects) has been revised to clarify the enforceability of accreditation. 326 IAC 14-10 (Emission Standards for Asbestos) was not submitted as a SIP and not approved. Therefore, this requirement that an inspector be "Indiana" accredited cannot be federally enforceable. However, the requirement that the inspector be accredited is a provision of 40 CFR 61, Subpart M. Therefore, the following revision has been made to clarify what is federally enforceable. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited**, pursuant to the provisions of 40 CFR 61, Subpart M,** is federally enforceable.

17. A new Condition C.11 has been added to the permit. The rest of Section C will be re-numbered accordingly.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

18. A new Condition C.13 has been added to the permit. The rest of Section C will be re-numbered accordingly.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a (temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

19. C.13 (Risk Management Plan) (now re-numbered C.15) has been updated to revised the compliance schedule submission date for sources subject to the RMP requirements of 40 CFR 68.

C.1~~3~~**5** Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68~~ by the date provided in 40 CFR 68.10(a)~~; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); ~~and~~

~~(c) A verification to IDEM, OAQ, and the St. Joseph County Health Department, that a RMP or a revised plan was prepared and submitted~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. A new Condition C.16 has been added to the permit. The rest of Section C will be re-numbered accordingly.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and the St. Joseph County Health Department upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

21. IDEM, OAQ has revised Condition C.14 (Actions Related to Noncompliance Demonstrated by a Stack Test) (now re-numbered C.17); a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.1~~4~~**7** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.17 (General Reporting Requirements) (now re-numbered C.20) has been changed to indicate all forms instead of the choice between quarterly or semi-annual.

C.~~17~~**20** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

St. Joseph County Health Department
County-City Building, Room 914
South Bend, Indiana 46601-1870

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the St. Joseph County Health Department on or before the date it is due.

(d) Unless otherwise specified in this permit, ~~a~~**any quarterly ll** report**s** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The~~ **All** report**s** ~~does~~ **do** ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

23. Since St. Joseph County Health Department is not actively involved in the writing of the permit or compliance, references to St. Joseph County Health Department have been removed from the permit.

24. The following changes have been made to the Certification form, the Emergency Occurrence Report and the Quarterly Deviation and Compliance Monitoring Report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE DATA SECTION~~
and ST. JOSEPH COUNTY HEALTH DEPARTMENT

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 **Affidavit (specify)** _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
~~P.O. Box 6015~~
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

ST. JOSEPH COUNTY HEALTH DEPARTMENT

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice **in writing or** by ~~mail or~~ facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
ST. JOSEPH COUNTY HEALTH DEPARTMENT

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION ~~and~~ AND COMPLIANCE MONITORING REPORT

Source Name: Interplastic Corporation / Molding Products Division
Source Address: 1545 S. Olive Street, South Bend, Indiana 46619
Mailing Address: 1545 S. Olive Street, South Bend, Indiana 46619
Part 70 Permit No.: T141-6465-00091

Months: _____ to _____ Year: _____

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of ~~each~~ Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management
and St. Joseph County Health Department

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Interplastic Corporation / Molding Products Division
Source Location: 1545 S. Olive Street, South Bend, Indiana 46619
County: St. Joseph
SIC Code: 3087, 3089
Operation Permit No.: T141-6465-00091
Permit Reviewer: NH/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Interplastic Corporation / Molding Products Division relating to the operation of a sheet molding compound manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) Eleven (11) mixers, consisting of:
- (1) one (1) small cowles mixer, identified as Mixer 1, constructed in July 1978, with a maximum capacity of 6,770 pounds per hour, exhausting to vents V1 through V6;
- (2) one (1) large cowles mixer, identified as Mixer 2, constructed in April 1997, with a maximum capacity of 5,333 pounds per hour, exhausting to vents V1 through V6;
- (3) one (1) large littleford, identified as Mixer 3, constructed in March 1998, with a maximum capacity of 4,400 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vent V9;
- (4) one (1) small littleford, identified as Mixer 4, constructed in March 1998, with a maximum capacity of 2,000 pounds per hour;
- (5) one (1) tabletop cowles mixer, identified as Mixer 5, constructed in July 1978, with a maximum capacity of 500 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b;
- (6) one (1) holding tank, identified as Mixer 6, constructed in March 1998, with a maximum capacity of 1,250 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b;
- (7) one (1) holding tank, identified as Mixer 7, constructed in March 1998, with a maximum capacity of 1,250 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b;

(8) one (1) holding tank, identified as Mixer 8, constructed in March 1998, with a maximum capacity of 1,250 pounds per hour, utilizing one (1) dust collector for particulate matter control, and exhausting to vents V9a and V9b;
(9) one (1) premix tank, identified as Mixer 9, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a and V9b;
(10) one (1) pump tank, identified as Mixer 10, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;
(11) one (1) pump tank, identified as Mixer 11, constructed in March 1998, with a maximum capacity of 3,750 pounds per hour, and exhausting to vents V9a, V9b, V9c and V9d;

(b) Four (4) molding presses, consisting of:
(1) one (1) compression press, identified as Press 1, constructed in June 1980, with a maximum capacity of 100 pounds per hour;
(2) one (1) compression press, identified as Press 2, constructed in July 1978, with a maximum capacity of 100 pounds per hour;
(3) one (1) press, identified as Press 3, constructed in July 1978, with a maximum capacity of 50 pounds per hour;
(4) one (1) compression press, identified as Press 4, constructed in July 1978, with a maximum capacity of 10 pounds per hour;

(c) One (1) extruder, constructed in February 1983, with a maximum capacity of 5000 pounds per hour, exhausting to vent V8;

(d) One (1) sheet molding compound manufacturing operation, identified as SMC-1, constructed in July 1978, with a maximum process weight rate of 8,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d;

(e) One (1) sheet molding compound manufacturing operation, identified as SM-9603-48, constructed in April 1998, with a maximum process weight rate of 8,000 pounds per hour, exhausting to vents V9a, V9b, V9c and V9d; and

(f) One (1) maturation room, constructed in 1996, with a maximum process weight rate of 8,000 pounds per hour from SMC-1 and a maximum process weight rate of 8,000 pounds per hour from SMC-2.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
(a) Three (3) Lennox rooftop units, identified as Unit #1, Unit #2 and Unit #3, each with a maximum heat input capacity of 0.5 MMBtu/hr, exhausting to three (3) stacks, identified as S7, S8 and S9, respectively;
(b) Two (2) Carrier Package Systems, identified as Unit #4 and Unit #5, each with a maximum heat input capacity of 0.2 MMBtu/hr, exhausting to two (2) stacks, identified as S3 and S4, respectively;
(c) Two (2) Lennox pulse units, identified as Unit #6 and Unit #7, each with a maximum heat input capacity of 0.26 MMBtu/hr, exhausting to two (2) stacks, identified as S5 and S6, respectively;
(d) Two (2) direct fired air make-up units, identified as Unit #1 and Unit #2, each with a maximum heat input capacity of 0.99 MMBtu/hr, both exhausting to one (1) vent, identified as V9;
(e) One (1) direct fired air make-up unit, with a maximum heat input capacity of 1.2 MMBtu/hr, exhausting to vents V1 through V6;

(2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour; and

(3) Four (4) polyester resin storage tanks, identified as Tank 1, Tank 2, Tank 3 and Tank 4, each constructed in 1978 and each with a maximum tank capacity of 5,700 gallons;

(4) One (1) polyester resin storage tank, identified as Tank 5, constructed in 1978, with a maximum tank capacity of 5,700 gallons; and

(5) Two (2) polyester resin storage tanks, identified as Tank 6 and Tank 7, each constructed in 1978 and each with a maximum tank capacity of 6,200 gallons.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on August 22, 1996. Additional information received on November 26, 1996, September 20, 2000, September 22, 2000 and September 28, 2000 makes the Part 70 permit application administratively complete.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 8).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	41.86
PM-10	42.00
SO_2	0.01
VOC	74.58
CO	2.06
NO_x	2.45

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	74.45
TOTAL	74.45

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP and total HAPs are equal to or greater than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Mixer 1, Mixer 2 and Mixer 5	24.38	24.38	0.00	21.53	0.00	0.00	21.53	21.53
Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11 *	0.01	0.01	0.00	24.00	0.00	0.00	36.56	36.56
Molding Presses	0.00	0.00	0.00	2.51	0.00	0.00	2.51	2.51
Extruder Operation	0.00	0.00	0.00	3.29	0.00	0.00	3.29	3.29
Sheet Molding Compound Operation	0.00	0.00	0.00	10.51	0.00	0.00	10.51	10.51
Maturation Room	0.00	0.00	0.00	0.06	0.00	0.00	0.06	0.06
Insignificant Activities	0.05	0.19	0.01	0.13	2.06	2.45	0.00	0.00
Total Emissions	24.45	24.59	0.01	62.03	2.06	2.45	74.45	74.45

***** Mixers 3, 4, 6, 7, 8, 9, 10 and 11 are taking a material usage limitation to avoid 326 IAC 8-1-6 (BACT). The mixers are not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because they are independent of one another and each mixer has potential single HAP emissions of less than ten (10) tons per year.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as maintenance attainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) St. Joseph County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The four (4) 5,700 gallon polyester resin storage tanks, identified as Tank 1, Tank 2, Tank 3 and Tank 4 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110c, Subpart Kb) because the tanks have a storage capacity of less than 40 cubic meters.

(b) The one (1) 5,700 gallon polyester resin storage tank, identified as Tank 5 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110c, Subpart Kb) because the tank has a storage capacity of less than 40 cubic meters.

(c) The two (2) 6,200 gallon polyester resin storage tanks, identified as Tank 6 and Tank 7 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110c, Subpart Kb) because the tanks have a storage capacity of less than 40 cubic meters.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD) as it has the potential to emit any criteria pollutant below 250 tons per 12-month period and this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and it is located in St. Joseph County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Since this source is located in St. Joseph County in the area north of Kern Road and east of Pine Road, it is subject to the requirements of 326 IAC 5-1-2(2). Pursuant to 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs a major source of hazardous air pollutants (HAPs) after July 27, 1997, shall comply with the requirements of this rule. This rule requires all facilities constructed after July 27, 1997, which have potential to emit of single and total HAPs of 10 and 25 or more tons per year, respectively, to reduce single and total HAP emissions using Maximum Achievable Control Technology (MACT).

(a) The eight (8) mixers, identified as Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11, constructed in March 1998, are not subject to this rule because each mixer is independent of one another and each mixer has the potential to emit single HAP of less than 10 tons per year. Therefore, the eight (8) mixers will not be subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

(b) The one (1) sheet molding compound operation, identified as SMC-2, constructed in

April 1998, is not subject to this rule because it has the potential to emit single HAP of less than 10 tons per twelve (12) consecutive month period. Therefore, SMC-2 will not be subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the following processes shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)*	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Mixer 1	1.5571	3.11	None	3.11	5.52
Mixer 2	1.22659	2.45	None	2.45	4.70
Mixer 3	1.012	2.02	99.9	0.00	4.13
Mixer 5	0.115	0.23	99.9	0.00	0.96
Mixer 6	0.2875	0.58	99.9	0.00	1.78
Mixer 7	0.2875	0.58	99.9	0.00	1.78
Mixer 8	0.2875	0.58	99.9	0.00	1.78

* Process Weight Rate (tons/hr) is calculated as follows: (process weight rate (lbs/hr) * 46% (average filler (powder) loading) / (2000 lbs/ton)

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC of 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements.

(a) The one (1) mixer, identified as Mixer 1, constructed in Juy 1978, is not subject to this rule because it was constructed before the applicability date of this rule.

(b) The one (1) mixer, identified as Mixer 2, constructed in April 1997, is not subject to this rule because it has the potential to emit VOC less than 25 tons per twelve (12) consecutive month period.

(c) The one (1) mixer, identified as Mixer 5, constructed in August 1978, is not subject to this rule because it was constructed before the applicability date of this rule.

(d) The eight (8) mixers, identified as Mixer 3, Mixer 4, Mixer 6, Mixer 7, Mixer 8, Mixer 9, Mixer 10 and Mixer 11, constructed in March 1998, have the potential to emit VOC above 25 tons per year. However, the VOC emissions from the eight (8) mixers shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable to the nine (9) mixers.

(e) The one (1) molding press, identified as Press 1, constructed in June 1980, is not subject to this rule because it has the potential to emit VOC less than 25 tons per twelve (12) consecutive month period.

(f) The three (3) molding presses, identified as Press 2, Press 3 and Press 4, constructed in July 1978, are not subject to this rule because they were constructed before the applicability date of this rule.

(g) The one (1) extruder, constructed in February 1983, is not subject to this rule because it has the potential to emit VOC less than 25 tons per twelve (12) consecutive month period.

(h) The one (1) sheet molding compound operation, identified as SMC-1, constructed in July 1978, is not subject to this rule because it was constructed before the applicability date of this rule.

(i) The one (1) sheet molding compound operation, identified as SMC-2, constructed in April 1998, is not subject to this rule because it has the potential to emit VOC less than 25 tons per twelve (12) consecutive month period.

(j) The one (1) maturation room, constructed in 1996, is not subject to the requirements of 326 IAC 8-1-6 because it has the potential to emit VOC of less than 25 tons per twelve (12) consecutive month period.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source (Mixer1, Mixer 5, Press 2, Press 3, Press 4 and SMC-1) does not have potential VOC emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

Testing Requirements

The source has submitted alternative emission factors ("Emission estimates for SMC compounding and molding" from the Composites Fabricators Association) which have been used to determine potential emissions. Thus, the source needs to conduct stack testing to validate these emission factors.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this sheet molding compound manufacturing facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T141-6465-00091.**

Appendix A: Emission Calculations

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plt ID: 141-00091
Reviewer: NH/EVP

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Mixing Equipment	Molding Presses	Extruder Operation	Sheet Molding Compound Operation	Maturation Room	Insignificant Activities	**TOTAL**
PM	60.14	0.00	0.00	0.00	0.00	0.05	60.19
PM10	60.14	0.00	0.00	0.00	0.00	0.19	60.33
SO2	0.00	0.00	0.00	0.00	0.00	0.01	0.01
NOx	0.00	0.00	0.00	0.00	0.00	2.45	2.45
VOC	81.37	2.51	10.95	15.77	0.09	0.13	110.82
CO	0.00	0.00	0.00	0.00	0.00	2.06	2.06
total HAPs	81.37	2.51	10.95	15.77	0.09	0.00	110.69
worst case single HAP	81.37	2.51	10.95	15.77	0.09	0.00	110.69

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Mixing Equipment	Molding Presses	Extruder Operation	Sheet Molding Compound Operation	Maturation Room	Insignificant Activities	**TOTAL**
PM	36.59	0.00	0.00	0.00	0.00	0.05	36.64
PM10	36.59	0.00	0.00	0.00	0.00	0.19	36.78
SO2	0.00	0.00	0.00	0.00	0.00	0.01	0.01
NOx	0.00	0.00	0.00	0.00	0.00	2.45	2.45
VOC	55.01	2.51	10.95	15.77	0.09	0.13	84.46
CO	0.00	0.00	0.00	0.00	0.00	2.06	2.06
total HAPs	71.45	2.51	10.95	15.77	0.09	0.00	100.77
worst case single HAP	71.45	2.51	10.95	15.77	0.09	0.00	100.77

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emission Calculations
PM and PM10 emissions
from Mixing Equipment

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plant ID: 141-00091
Reviewer: NH/EVP

Unit ID	Products Mixed	Date of Construction	Emission Factor *	Average filler (powder) loading (%)**	Process Weight Rate (lbs/hr)	Potential PM/PM10 Emissions		Dust Collector Efficiency (%)	Controlled PM/PM10 Emissions	
						lbs/hr	tons/yr		lbs/hr	tons/yr
Mixer 1	Polyester Resin and powders	July 1978	0.10%	46.00%	9,000.00	4.14	18.13	N/A	4.14	18.13
Mixer 2	Polyester Resin and powders	April 1997	0.10%	46.00%	9,000.00	4.14	18.13	N/A	4.14	18.13
Mixer 3	Polyester Resin and powders	March 1998	0.10%	46.00%	9,000.00	4.14	18.13	99.90%	0.00	0.02
Mixer 4	Polyester Resin and powders	March 1998	0.10%	46.00%	2,700.00	1.24	5.44	99.90%	0.00	0.01
Mixer 5	Polyester Resin and powders	July 1978	0.10%	46.00%	150.00	0.07	0.30	N/A	0.07	0.30
					Total		**60.14**			**36.59**

* Emission factor provided by source (based on mass balance testing conducted at the plant, 0.1% of the material added to the mixers is lost)
** Average filler (powder) loading (%) was provided by the source

Only mixers 1, 2, 3, 4, and 5 mix polyester resin and powders (PM/PM10 emissions are generated as a result).

Appendix A: Emission Calculations
Volatile Organic Compounds and Hazardous Air Pollutants
from Mixing Equipment

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plant ID: 141-00091
Reviewer: NH/EVP

Unit ID	Product Mixed	Emission Factor *	Process Weight Rate (lbs/hr)	Potential VOC Emissions		Potential HAP Emissions	
				lbs/hr	tons/yr	lbs/hr	tons/yr
Mixer 1	Polyester Resin and powders	0.78	9,000.00	3.51	15.37	3.51	15.37
Mixer 2	Polyester Resin and powders	0.78	9,000.00	3.51	15.37	3.51	15.37
Mixer 3	Polyester Resin and powders	0.78	9,000.00	3.51	15.37	3.51	15.37
Mixer 4	Polyester Resin and powders	0.78	2,700.00	1.05	4.61	1.05	4.61
Mixer 5	Polyester Resin and powders	0.78	150.00	0.06	0.26	0.06	0.26
Mixer 6 (holding tank)	SMC Paste	0.059	2,800.00	0.08	0.36	0.08	0.36
Mixer 7 (holding tank)	SMC Paste	0.059	2,800.00	0.08	0.36	0.08	0.36
Mixer 8 (holding tank)	SMC Paste	0.059	2,800.00	0.08	0.36	0.08	0.36
Mixer 9	Polyester Resin and liquid additives	0.78	5,000.00	1.95	8.54	1.95	8.54
Mixer 10	SMC Paste	0.78	8,400.00	3.28	14.35	3.28	14.35
Mixer 11	SMC Paste	0.78	3,750.00	1.46	6.41	1.46	6.41
			Total		**81.37**		**81.37**

* Emission factor (lbs styrene emitted/tons of compound processed) provided by source (based on "Emission estimates for SMC compounding and molding" provided by the Composites Fabricators Association)

Unit	Uncontrolled VOC emissions (tons/yr)	Uncontrolled HAP emissions (tons/yr)	Date of construction	VOC Material Usage Limitation (%)	HAP Material Usage Limitation (%)	Controlled VOC emissions (tons/yr)	Controlled HAP emissions (tons/yr)
Mixer 1 and Mixer 5	15.63	15.63	July 1978	n/a	n/a	15.63	15.63
Mixer 2	15.37	15.37	April 1997	n/a	n/a	15.37	15.37
Mixer 3	15.37	15.37	March 1998	47.66%	64.41%	7.33	9.90
Mixer 10	14.35	14.35	March 1998	47.66%	68.99%	6.84	9.90
Mixers 4, 6, 7, 8, 9 and 11	20.64	20.64	March 1998	47.66%	n/a	9.84	20.64
Total	**81.37**	**81.37**				**55.01**	**71.45**

Mixer 1 and Mixer 5 are not subject to BACT or MACT because they were constructed before the applicability dates of both these rules.
Mixer 2 is not subject to BACT because potential VOC emissions are below 25 tons/yr, also it is not subject to MACT becuase it was constructed before the applicability date of this rule.
Mixers 3, 4, 6, 7, 8, 9, 10 and Mixer 11 are subject to BACT and will take a material usage limiation to avoid being subject to the rule.
Mixer 3 and Mixer 10 are subject to MACT and will take a material usage limitation to avoid being subject to the rule.
Mixers 4, 6, 7, 8, 9 and Mixer 11 are not subject to MACT because each mixer is independent of one another and each mixer has potential single HAP emissions of less than 10 tons per year.

Appendix A: Emission Calculations
Volatile Organic Compounds and Hazardous Air Pollutants
from Molding Presses

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plant ID: 141-00091
Reviewer: NH/EVP

	Date of	Emission	Process	Potential VOC Emissions		Potential HAP Emissions	
Unit ID	Construction	Factor*	Weight Rate (lbs/hr)	lbs/hr	tons/yr	lbs/hr	tons/yr
Molding press 1	June 1980	4.4	100.00	0.22	0.96	0.22	0.96
Molding press 2	July 1978	4.4	100.00	0.22	0.96	0.22	0.96
Molding press 3	July 1978	4.4	50.00	0.11	0.48	0.11	0.48
Molding press 4	July 1978	4.4	10.00	0.02	0.10	0.02	0.10
				Total	**2.51**		**2.51**

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Notes:
Molding press 3 and molding press 4 are used for quality control or R&D purposes only, and not for production purposes.

Appendix A: Emission Calculations
Volatile Organic Compounds and Hazardous Air Pollutants
from Sheet Molding Compound Operation

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plant ID: 141-00091
Reviewer: NH/EVP

Unit ID	Product Mixed	Date of Construction	Emission Factor*	Process Weight Rate (lbs/hr)	Potential VOC Emissions		Potential HAP Emissions	
					lbs/hr	tons/yr	lbs/hr	tons/yr
SMC-1	Polyester Resin	July 1978	0.3	12,000.00	1.80	7.88	1.80	7.88
SMC-2	Polyester Resin	April 1998	0.3	12,000.00	1.80	7.88	1.80	7.88
				Total		**15.77**		**15.77**

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Appendix A: Emission Calculations
Volatile Organic Compounds and Hazardous Air Pollutants
from the Maturation Room

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plant ID: 141-00091
Reviewer: NH/EVP

Unit ID	Product Dryed from	Emission Factor*	Process Weight Rate (lbs/hr)	Potential VOC Emissions		Potential HAP Emissions	
				lbs/hr	tons/yr	lbs/hr	tons/yr
Maturation Room	SMC-1	0.0018	12,000.00	0.01	0.05	0.01	0.05
Maturation Room	SMC-2	0.0018	12,000.00	0.01	0.05	0.01	0.05
				Total	**0.09**		**0.09**

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Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Interplastic Corporation / Molding Products Division
Address City IN Zip: 1545 S. Olive Street, South Bend, IN 46619
Title V: 141-6465
Plt ID: 141-00091
Reviewer: NH/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.6	49.1

Facilities	MMBtu/hr
Lennox Rooftop Unit (Unit #1)	0.5
Lennox Rooftop Unit (Unit #2)	0.5
Lennox Rooftop Unit (Unit #3)	0.5
Carrier Package System (Unit #4)	0.2
Carrier Package System (Unit #5)	0.2
Lennox Pulse Unit (Unit #6)	0.26
Lennox Pulse Unit (Unit #7)	0.26
Weather Rite Unit (Unit #1)	0.99
Weather Rite Unit (Unit #2)	0.99
Applied Air System Unit (Unit #3)	1.2
Total	**5.6**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.05	0.19	0.01	2.45	0.13	2.06

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).